

EXHIBIT 32

1 ANDREW JOHN LEGG

2 UNITED STATES DISTRICT COURT
3 DISTRICT OF MINNESOTA

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5 In re Bair Hugger Forced
6 Air Warming Products
7 Liability Litigation,

8 MDL No. 15-2666 (JNE/FLN)

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11 VIDEOTAPED DEPOSITION OF

12 ANDREW JOHN LEGG

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16
17 Taken Thursday, December 1st, 2016

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23
24 Reported By: Victoria Davies

25 Job No: 115949

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Q. Particle count?

A. Yes.

Q. And then this bubble machine?

A. Correct.

Q. And you made each of those three measurements as to three different scenarios. The Bair Hugger --

A. Yes.

Q. -- the HotDog, and a control study where there was no heat. Correct?

A. Correct.

Q. Was there anything changed between when you took the measurements from the Bair Hugger on the temperature, to when you took the measurements for the HotDog regarding temperature?

A. No.

Q. No change to the machine calculating or measuring the temperature?

A. No.

Q. Was there any changes at between when you were measuring temperature to the control?

A. No.

Q. Likewise, was there any changes made to the particle count machine as between when you

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measured the forced-air warming blanket and moving to the HotDog?

A. No.

Q. No changes made to the measurement there?

A. No.

Q. Again, no changes as between those and the control?

A. No.

Q. Were there any changes made to the bubble machine between when you had the Bair Hugger on and the HotDog?

A. No.

Q. Any changes to the bubble machine as between when the Bair Hugger was on and the control?

A. No.

Q. You did your best to keep all of the measurements tools the same?

A. Correct.

Q. Why is that important to you?

A. Because we wanted to find out one thing and that is the effect of the warming device and if we changed other parameters it could have resulted in a misleading outcome.

Q. It was important to you that this paper

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be accurate?

A. Correct.

Q. What was the principle finding in the mannequin study?

A. That forced-air warming increased the temperature over the surgical site, but fundamentally caused convection currents to be created and particles drawn up from below the level of the table onto the surgical site.

Q. Have you ever had any classes in engineering?

A. If you class physics as engineering at school, yes, but otherwise no.

Q. Okay. I take it you would not consider yourself an expert in fluid dynamics, for example?

A. No.

Q. Are you familiar with some of the basic ideas in fluid dynamics?

A. Very basic.

Q. All right. In this mannequin study, you found 1,000-fold increase in concentration of particles for the forced-air warming blankets, as compared to the radiant warming. Is that correct?

A. That is correct.

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Q. That was significant to you?

A. Yes.

Q. Mr. Gordon asked you some questions about the statistical analysis done in connection with this study?

A. Yes.

Q. Did you do that yourself?

A. I did.

Q. Do you recall what the p-value was of your calculations?

A. It was -- I can't specifically recall. It was very, very low. I will have to have a look.

THE EXAMINER: 408.

MS. ZIMMERMAN: The p-value is .00 --

A. 001.

Q. 2.

THE EXAMINER: Where do we find that?

MS. ZIMMERMAN: Middle of the first, second full paragraph on page 408.

THE EXAMINER: Right, thank you.

BY MS. ZIMMERMAN:

Q. Is that correct?

A. That is correct.

THE EXAMINER: Do you want to explain

28 (Pages 106 to 109)